

# Sage Legal LLC

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April 14, 2025

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Vera M. Scanlon, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13A South  
Brooklyn, NY 11201-1804

**Re: Singh v. Topline NYC Contracting Inc., et al.**  
**Case No.: 1:25-cv-776 (NCM) (VMS)**

Dear Judge Scanlon:

This firm represents Plaintiff Joginder Singh (hereinafter the “Plaintiff”) in the above-referenced case. Plaintiff respectfully submits this reply letter in further support of his motion for sanctions pursuant to Rule 5.2 of the Federal Rules of Civil Procedure (hereinafter referred to as “Rules” or “Rule”).

Defendants concede their failure to comply with Rule 5.2 but excuse it by claiming that Topline NYC Contracting Inc (“Topline Contracting”) is owned by them. This is simply not so. See ECF Docket Entry [1](#) at ¶¶ 27-28 (alleging that Topline Contracting was opened by the Defendants using Plaintiff’s forged signature, such that Plaintiff is the owner of Topline Contracting), ¶ 43(d) (Defendants held Plaintiff out as the owner of Topline Contracting); see also ECF Docket Entry [13](#) at 4, Counterclaim ¶ 2 (“To help plaintiff, defendants formed a corporation for plaintiff to work and make money, Topline NYC Contracting, Inc”).

In light of these allegations, which constitute judicial admissions, Defendants cannot claim ownership of an entity that they fraudulently opened in Plaintiff’s name to evade sanctions. Since Plaintiff is concededly the owner of Topline Contracting, and because the sole basis for Defendants’ opposition to an Order issuing sanctions for their admitted violations of Rule 5.2, this Court should issue appropriate sanctions in light of these circumstances, especially because the Defendants have not taken any action to purge their violations.

Plaintiff thanks this honorable Court for its time and attention to this case.

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Dated: Lake Success, New York  
April 14, 2025

Respectfully submitted,

**SAGE LEGAL LLC**

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**VIA ECF**

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